
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

HEATHER NELSON,

Plaintiff,

v.

**SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC., d/b/a/
AMERICAN RECOVERY SERVICE, and
ASSETSBIZ CORP., d/b/a ABC
RECOVERY,**

Defendants,

SANTANDER CONSUMER USA, INC.,

Counter-Plaintiff,

v.

HEATHER NELSON,

Counter-Defendant.

Case No.: 11-cv-307

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION TO COMPEL
DISCOVERY RESPONSES TO HER
FIRST AND SECOND SET OF
DISCOVERY REQUESTS**

TO: SANTANDER CONSUMER USA, INC.
c/o Attorney Gary Caplan and Attorney Max Stein
ReedSmith LLP
10 South Wacker Drive
Chicago, IL 60606-7507

PLEASE TAKE NOTICE the Plaintiff, Heather Nelson, by her attorneys, Mary Catherine Fons and Ivan Hannibal, moves the Court for: 1) An order to compel discovery related to Plaintiff's first and second set of discovery requests to Defendant Santander Consumer USA, Inc.; and 2) An order requiring Defendant Santander Consumer USA, Inc., to pay Plaintiff her reasonable expenses, including attorney's fees, for bringing her motion to compel, pursuant to Federal Rule of Civil

Procedure 37(a)(5).

The grounds for this motion are that Defendant Santander Consumer USA, Inc., has failed to adequately, properly, and timely respond to Plaintiffs properly served discovery requests, including requests for the production of documents and interrogatories. The grounds for this motion are further set forth in:

- 1) Plaintiff's Brief in Support of Motion to Compel Discovery Responses to Her First and Second Set of Discovery Requests; and
- 2) Affidavit of Mary Catherine Fons.

Dated this 3rd day of October, 2012.

s/ Ivan Hannibal
Mary Catherine Fons, SBN 1017000
FONS LAW OFFICE
500 South Page Street
Stoughton, WI 53589
Phone: (608) 873-1270
Fax: (608) 873-0496

Ivan Hannibal, SBN 1050360
CONSUMER RIGHTS LAW OFFICE
5908 Running Deer Trail
McFarland, WI 53558
Phone: (608) 852-6702

ATTORNEYS FOR PLAINTIFF